

**BEAUGUREAU, HANCOCK,
STOLL & SCHWARTZ, P.C.**

302 East Coronado Road
Phoenix, Arizona 85004
(602) 956-4438

Anthony J. Hancock (#005889)

ahancock@bhsslaw.com

Terrance L. Sims (#009566)

tsims@bhsslaw.com

Attorneys for Plaintiff Union Pacific Railroad Company

RUSING & LOPEZ, P.L.L.C.

6262 North Swan Rd., Suite 200
Tuscon, Arizona 85718
Telephone: (520) 792-4800
Facsimile: (520) 529-4262

Pat.P. Lopez III, State Bar No. 006918

plopez@rusingandlopez.com

Sean E. Brearcliffe, State Bar No. 016861

sbrearcliffe@rusingandlopez.com

Attorneys for Defendant Arizona Electric Power Cooperative, Inc.

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF ARIZONA

UNION PACIFIC RAILROAD COMPANY,

Plaintiff,

vs.

ARIZONA ELECTRIC POWER
COOPERATIVE, INC.,

Defendant.

) No. 4:09-CV-45-TUC-FRZ

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**STIPULATION FOR EXTENSION OF
DEADLINES FOR DISCLOSURE OF
EXPERTS' IDENTITY, TESTIMONY
AND REPORT**

(Seventh Request)

And

**STIPULATION TO EXTEND
DEADLINES FOR COMPLETION OF
DISCOVERY**

(Fifth Request)

Assigned to the Hon. Frank R. Zapata)

The parties report the Court has granted six extensions related to expert disclosures, see Sixth Order Extending Deadlines dated October 5, 2010. At this time, the parties request the Court grant an extension of the current deadlines by a few weeks to allow for scheduling issues encountered while noticing depositions, which are currently scheduled for November 17 and December 2, 2010. The parties stipulate and request the Court extend the deadlines as follows:

AEPCO's pre-trial disclosure of "Identity, Testimony and Report Disclosure" is due December 6, 2010, and UP's rebuttal expert testimony and report is due January 3, 2011. The parties hereby stipulate to extend AEPCO's due date for expert witnesses' identity, testimony and report to December 22, 2010 and UP's (rebuttal) due date to January 26, 2011.

Pursuant to LR Civ. 7.3, the parties report that the Court has granted four previous extensions for completion of discovery with the current deadline set for February 1, 2011. See Fourth Order Extending Deadlines dated October 5, 2010. The parties stipulate to extend the discovery deadline to February 17, 2011 to correspond with extended expert disclosure deadlines set forth above. The parties do not move to alter any other dates (*i.e.*, dispositive motion deadline).

DATED this 12th day of November, 2010.

ARIZONA ELECTRIC POWER COOPERATIVE,
INC.

/s/ Sean E. Brearcliffe

Pat P. Lopez, III

Sean E. Brearcliffe

Rusing & Lopez, P.L.L.C.

6262 N. Swan Road, Suite 200

Tucson, AZ 85718

UNION PACIFIC RAILROAD COMPANY

/s/ Terrance L. Sims

Anthony J. Hancock

Terrance L. Sims

BEAUGUREAU, HANCOCK,

STOLL & SCHWARTZ, P.C.

302 East Coronado Road

Phoenix, Arizona 85004

1 William L. Slover
Robert D. Rosenberg
2 Daniel M. Jaffe
Slover & Loftus LLP
3 1224 Seventeenth Street, N.W.
Washington, D.C. 20036
4

Rebecca B. Gregory
General Attorney
Union Pacific Railroad Company
1400 Douglas Street
Mail Stop 1580
Omaha, NE 68179

5 CERTIFICATE OF SERVICE

6 I hereby certify that on November 12, 2010, I electronically transmitted the attached
Stipulation for Extension of Deadlines to the Clerk's office using the CM/ECF System for filing
7 and transmittal of a Notice of Electronic Filing to the Following CM/ECF registrants:

8 Pat P. Lopez III, Esq.
Sean E. Brearcliffe, Esq.
9 RUSING & LOPEZ, PLLC
6262 N. Swan Road, Suite 200
10 Tucson, AZ 85718

11 Dwight Whitley, Esq.
Corporate Counsel
ARIZONA ELECTRIC POWER COOPERATIVE, INC.
13 1000 S. Highway 80
Benson, AZ 85602
14

15 William L. Slover, Esq.
Robert D. Rosenberg, Esq.
Daniel M. Jaffe, Esq.
16 SLOVER & LOFTUS LLP
1224 Seventeenth Street, N.W.
17 Washington, D.C. 20036

18 By: /s/ Lori Curry
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